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24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE
27 MEMORIAL HOSPITAL, INC. (doing
28 business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually,
TAUSIF HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
THIRD-PARTY DEFENDANTS’ TIME
TO RESPOND TO SECOND
AMENDED THIRD-PARTY CLAIMS**

(FIRST REQUEST)

1 Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of
2 Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit Third-
3 Party Defendants Christi El-Meligi and Netrishia Dalgai additional time, to and until December
4 30, 2022, to respond to “Defendant RDC’s Counterclaims And Second Amended Third-Party
5 Claims” filed by Razaghi Development Company, LLC (“RDC”) on November 29, 2022. ECF
6 No. 217.

7 In support of this Stipulation, the parties rely upon the following:

8 1. Undersigned counsel for Ms. El-Meligi and Ms. Dalgai (Paul Padda) is currently in trial
9 which is not scheduled to conclude until December 15, 2022. Additionally, his co-counsel in this
10 matter, are also very busy with competing case commitments during this same time-period. In light
11 of the foregoing, respective counsel for the parties to this stipulation have communicated regarding
12 this matter and agree that additional time is warranted under the circumstances.

13 2. Counsel for both parties respectfully request the Court approve this Stipulation and
14 permit Ms. El-Meligi and Ms. Dalgai to respond to RDC’s November 29, 2022 filing on or before
15 December 30, 2022.

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The parties respectfully request the Court approve this Stipulation.

/s/ Kris Leonhardt

/s/ Paul S. Padda

Pavneet S. Uppal, Esq.
Kris Leonhardt, Esq.
Jeffrey D. Winchester, Esq
Counsel for Razaghi Development Company, LLC

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Paul S. Padda, Esq.
David Stander, Esq.
Douglass A. Mitchell, Esq.
*Counsel for
Third-Party Defendants*

Dated: December 13, 2022

Dated: December 13, 2022

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: December 14, 2022